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**From:**  
**To:**  
**Subject:** FW: FAO Niko Grigoropoulos - Woodland Trust comments on application 20/01238/OUTMAJ  
**Attachments:** Sandford Park planning application 18\_00764\_OUTMAJ.PDF

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**From:** [campaigning@woodlandtrust.org.uk](mailto:campaigning@woodlandtrust.org.uk) [<mailto:campaigning@woodlandtrust.org.uk>]  
**Sent:** 31 July 2020 17:09  
**To:** Planapps <[Planapps@westberks.gov.uk](mailto:Planapps@westberks.gov.uk)>  
**Cc:** [campaigning@woodlandtrust.org.uk](mailto:campaigning@woodlandtrust.org.uk)  
**Subject:** FAO Niko Grigoropoulos - Woodland Trust comments on application 20/01238/OUTMAJ

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Dear Mr Grigoropoulos,

Thank you for the opportunity to provide comment on the above application.

The Woodland Trust will be **maintaining an objection** to the proposed development as our concerns with regards to the ancient woodlands on site have not been addressed. I have attached the Trust's previous objection to application 18/00764/OUTMAJ and also summarised the Trust's previous objection to application 18/00828/OUTMAJ below:

*The Trust would like to highlight that Brick Kiln Copse (grid reference: SU462640) could be potentially unmapped ancient woodland. Whilst the woodland is not designated as ancient woodland on Natural England's Ancient Woodland Inventory, it is present on the 1st edition OS map, and the Environmental Statement determines that there are 23 ancient woodland indicator species present within the woodland. As such, the Trust requests that the applicants seek clarification from Natural England on the issue.*

*If Brick Kiln Copse is unmapped ancient woodland, then the woodland should be considered in line with both paragraph 118 of the National Planning Policy Framework and Natural England's Standing Advice for ancient woodland and veteran trees. On that basis, the Trust would recommend a buffer of 50m (excluding gardens) between Brick Kiln Copse and all areas of the development, and ensuring that the SUDs required to facilitate this development does not result in direct loss of ancient woodland.*

*In addition, the Trust would like to ensure that any trees on site which display veteran characteristics, or if given time could potentially develop veteran characteristics, are adequately protected within the development. This will be through the implementation of Root Protection Areas of at least 15x the stem diameter, or 5m beyond the canopy, (whichever is greater) for all veteran/notable specimens in line with Natural England's Standing Advice.*

*In summary, the Trust would like to place a holding objection to all application 18/00828/OUTMAJ until the ancient woodland status of Brick Kiln Copse has been determined. If designated as ancient woodland, the Trust would like to see the above recommendations implemented to ensure there are no long-term detrimental impacts or loss to an irreplaceable habitat.*

Since our previous response, the National Planning Policy Framework has been updated and protection for ancient woods and trees has been increased. Paragraph 175c now states: "When determining planning applications, local planning authorities should apply the following principles:

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) **should be refused**, unless there are wholly exceptional reasons<sup>58</sup> and a suitable compensation strategy exists;

Footnote 58, defines exceptional reasons as follows: "For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills),

where the public benefit would clearly outweigh the loss or deterioration of habitat.” There is **no wholly exceptional reason** for the development in this location and as such this development should be refused on the grounds it does not comply with national planning policy.

We hope our comments are of use to you, if you would like to discuss anything further, please do not hesitate to get in touch.

Kind regards,  
Nicole Hillier

**Nicole Hillier**  
**Campaigner - Woods Under Threat**

Telephone: 03437705438

Email: [NicoleHillier@woodlandtrust.org.uk](mailto:NicoleHillier@woodlandtrust.org.uk)

The Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL  
0330 333 3300

[www.woodlandtrust.org.uk](http://www.woodlandtrust.org.uk)

Cases involving woods and trees under threat can change and evolve during the planning process due to a wide variety of reasons. Where a development involving ancient woods or veteran trees no longer remains a threat due to changing circumstance surrounding said application and based upon professional judgement steered by our conservation research, the Woodland Trust withholds the right to withdraw or amend its objection and review its approach.

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Registered Office: Kempton Way, Grantham, Lincolnshire, NG31 6LL.

<http://www.woodlandtrust.org.uk>



The Woodland Trust  
Kempton Way  
Grantham  
Lincolnshire  
NG31 6LL

Telephone  
01476 581111  
Facsimile  
01476 590808

Website  
[woodlandtrust.org.uk](http://woodlandtrust.org.uk)

West Berkshire Council  
Council Offices  
Market Street  
Newbury  
RG14 5LD

15<sup>th</sup> June 2018

Dear Mr Brown,

**Planning application: 18/00764/OUTMAJ**

**Proposal: Outline planning permission for up to 1,000 new homes; an 80 bed extra care facility as part of the affordable housing provision; a new 2 form entry primary school (D1); expansion land for Park House Academy School; a local centre to comprise flexible commercial floorspace (A1-A5 up to 2,150sq m, B1a up to 200sq m) and D1 use; the formation of new means of access onto Monks Lane; new open space including the laying out of a new country park; drainage infrastructure; walking and cycling infrastructure and other associated infrastructure works. Matters to be considered: Access. | Sandleford Park, Newtown Road, Newtown, Newbury, Berkshire**

The Woodland Trust is the UK's leading woodland conservation charity. We aim to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 24,000 hectares (59,000 acres) and we have 500,000 members and supporters.

The Trust has commented on previous iterations of development proposed at the Sandleford Park site. Previously it has been apparent that proposed development would affect a number of areas of ancient woodland within the site. In terms of the application in question we consider that the following ancient woods would be subjected to damage:

- Crook's Copse – ASNW (Ancient Semi-Natural Woodland) (grid ref: SU469651)
- Barn Copse – ASNW (SU464647)
- Slockett's Copse – ASNW (SU468647)
- Unnamed ASNW at SU46666473
- High Wood – ASNW (SU470647)
- Dirty Ground Copse – ASNW (SU467645)

As such, the Trust **objects** to the application in question on account of damage and potential loss to these ancient woods. We have highlighted below specific impacts that would impact on ancient woodland and veteran trees.

## **Planning policy**

National Planning Policy Framework, paragraph 118, states that “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.”

Natural England’s Standing Advice for Ancient Woodland and Veteran Trees<sup>1</sup> states: “Ancient woodland, and trees classed as ‘ancient’, ‘veteran’ or ‘aged’ are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreational value, and cultural, historical and landscape value.”

The draft revised National Planning Policy Framework, published on 5 March 2018, further outlines the Government’s commitment to improving protection for ancient woodland through the planning system. It states that “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists.” This wording is a clear recognition from the Government of ancient woodland’s importance and better need for protection.

Keepers of Time, a statement of Policy for England’s Ancient and Native Woodland, jointly written by Defra and the Forestry Commission, recognises a number of threats to ancient woodland, making specific reference to the threat posed by development pressures: “There are still occasions where native and ancient woodland is threatened by development, and many woods suffer attrition through incursions at their boundaries. Even if the woodland itself is protected, it can suffer serious disturbance where houses or roads are built right up to its margins, both directly from the impact of development, or indirectly through changes to drainage.”

## **Impacts on ancient woodland**

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since at least 1600 AD. Ancient woodland is characterised by the length at which it has remained wooded (centuries, even millennia), which in turn has resulted in vital links having developed between plants, animals and soils. As such, ancient woodland provides varied and unique habitats for many of the UK’s most important and threatened fauna and flora species.

The Trust has considerable concerns in relation to the impact of the proposed development on areas of ancient woodland within the site and also potential impacts on veteran trees. While the loss of ancient woodland is not being proposed there could be significant indirect

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<sup>1</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

impacts on account of the close proximity of development. We are particularly concerned about the following impacts:

- Direct impacts on the ancient woodland as a result of areas of the ancient woodland soil being scraped and 'translocated'.
- Considerable intensification of the recreational activity of humans and their pets can result in disturbance to breeding birds, vegetation damage, trampling, litter, and fire damage.
- Fragmentation as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats.
- Noise, light and dust pollution occurring from adjacent development, during both construction and operational phases.
- Where the wood edge overhangs public areas, trees can become safety issues and be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.
- Adverse hydrological impacts can occur where the introduction of hard-standing areas and water run-offs affect the quality and quantity of surface and ground water. This can result in the introduction of harmful pollutants/contaminants into the woodland.

The Trust is concerned about the potential impacts of path creation throughout the site and the mitigation being proposed to deal with the pressures of these paths. Boardwalk creation can result in considerable disturbance and should only be undertaken in extreme circumstances. However the most concerning element is the manner in which the applicants are proposing to mitigate impact on ancient woodland indicator species next to footpaths.

In the Ecological Mitigation and Management Plan it states: "... if ancient woodland indicator species are to be impacted either the plant itself or the seed bank will be translocated to the areas of the woodland which have been cleared of bramble and sycamore, which is currently of lower botanical value. In the event the seedbank will be translocated this will be scraped off during autumn and early winter to minimise damage to soil and plants."

The scraping of ancient woodland soils is an unacceptable practice and constitutes loss of ancient woodland. Ancient woodland soils are characterised by the relationships that have developed and evolved between mycorrhizal and microbial communities within the soil profile. By scraping the soil profile the positive associations between soil microbial communities and plants growing on the undisturbed soil will be heavily disrupted, meaning the characteristic ancient woodland soil will have been irreversibly damaged.

As the size of a development increases so does the intensity of the site's use, which in turn results in an increase in the associated adverse impacts and pressures. Plant and animal populations are exposed to environmental impacts from outside of the woodland, known as edge effects, which may consequently affect the wood's stable conditions. Detrimental edge effects have been shown to result in changes to ancient woodland characteristics up to three times the canopy height in from the forest edges.

As a result of the aforementioned impacts local biodiversity can be heavily affected and suffer losses; from resident and migrating wildlife, to site endemic soils and their associated flora. The populations of plants and animals exposed to the change in environmental conditions from the new development increases in magnitude with increasing land use intensity. Many species within ancient woodland are adapted to the relatively unchanging conditions within ancient woodland. They are slow to react to change and are not able to adapt to the new enforced conditions within the woodland which can lead to more generalist species dominating the specialist woodland species.

Creation of new areas of woodland or buffer zones around semi-natural habitats, and more particularly ancient woodland, will help to reduce and ameliorate the impact of damaging edge effects, serving to improve their sustainability. The minimum 15m buffer currently proposed to areas of woodland would not be fit for purpose.

Considering the size and scale of the development we consider that the appropriate protection in this case would necessitate the implementation of a **buffer of at least 50m** between any area of development and ancient woodland. Buffers should ideally be made up of at least 50% tree cover, planting this area if necessary. This will help to protect the ancient woodland from the impacts of the adjacent development, in line with the recommendations in the National Planning Policy Framework and Natural England's Standing Advice.

### **Impacts on veteran trees**

Ancient and veteran trees are a vital and treasured part of our natural and cultural landscape and represent a resource of great international significance, particularly considering that the UK is estimated to be home to around 80% of Europe's ancient trees. They harbour a unique array of wildlife and echo the lives of past generations of people.

A 'veteran tree' is usually in the second or mature stage of its life and has important wildlife and habitat features including; hollowing or associated decay fungi, holes, wounds and large dead branches. It will generally include old trees but also younger, middle aged trees where premature aging characteristics are present. A 'notable tree' is one of local importance, or of personal significance to the individual recorder. This includes trees considered to be potential, next generation veteran trees that are of a considerable size already.

Where an area may contain a significant concentration of veteran and notable trees, it is more likely that the variety of species among such trees will be greater. Therefore any loss of veteran trees or notable trees that display veteran characteristics would result in a decrease of available habitat for any rare species associated with decaying wood habitat, aging bark and old root systems.

For this reason it is essential that no trees displaying ancient/veteran characteristics are lost as part of the development. The applicant's Arboricultural Assessment notes that T34, a veteran oak, is likely to be lost on account of the school associated with the development. We object to the loss of this veteran tree. Further to this T127, an oak identified as a candidate

for veteranisation/potential veteran, has been highlighted for felling or pollarding to make the tree safe. Felling of this specimen would be completely inappropriate. Other options must be explored to ensure this specimen is retained. Any loss of veteran trees would be highly deleterious to the wider environment of veteran trees within close proximity, which may harbour rare and important species.

Further to this we also consider that the **minimum root protection area for veteran trees should be 15 times the trunk diameter or 5 metres beyond the crown of the tree**, whichever is greater. This view is supported by wording within Natural England's Standing Advice and also by the Ancient Tree Forum. We are concerned that if the protection area is limited, future risk assessments for the trees will determine that the tree needs to be felled due to past limb failures. The Trust is also concerned because people are inclined to use trees in all weather conditions as areas of protection, thus increasing the health and safety risk that the tree poses.

Trees are susceptible to change caused by construction/development activity. As outlined in "Trees in relation to design, demolition and construction, BS 5837:2012", the British Standard for ensuring development works in harmony with trees, construction work often exerts pressures on existing trees, as do changes in their immediate environment following the construction of a building. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard.

The guidance in Lonsdale *Ancient and other Veteran Trees: Further Guidance on Management* (2013) states in para 3.5.2.1 '...avoid creating new or increased targets: as happens for example following the construction of facilities (e.g. car parks or buildings) which will bring people or property into a high risk zone. Not only does this create targets, it also harms trees and therefore makes them more hazardous'. Our view is that the trees should be managed for their own sake so that as much as possible can be retained for as long possible and that cutting is a form of damage and should be kept to an absolute minimum.

## **Conclusion**

Ancient woods and veteran trees are irreplaceable; once lost they cannot be re-created. Any development resulting in damage or loss to ancient woodland is unacceptable and should be refused planning permission.

In summary, the Trust **objects** to the planning application in question on the basis of damage and potential loss to ancient woodland and the potential loss of notable and veteran trees on site.

The creation of boardwalk paths through ancient woodland and the 'translocation of ancient woodland soil seed banks' constitutes loss of ancient woodland and must not be allowed. Where development is proposed adjacent to areas of ancient woodland there must be a **buffer of at least 50m** maintained between the development and ancient wood.

We hope you find our comments to be of use to you. If you are concerned about any of the comments raised by the Trust then please do not hesitate to get in contact with us.

Yours sincerely,

Jack Taylor

Campaigner – Ancient Woodland